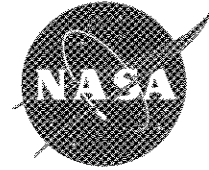


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



October 11, 2011

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the Space Transportation Association (STA) Breakfast on October 11, 2011

On October 11, 2011, the Space Transportation Association (STA), a nonprofit organization under 501(c)(6) of the Internal Revenue Code, will host a breakfast in the Dirksen Senate Office Building, Room 106, in Washington, D.C., from 7:30 AM to 9:00 AM. STA member organizations that support STA activities include Aerojet, ATK, Ball Aerospace, Honeywell, ITT, Lockheed Martin, Orbital, Paragon, United Launch Alliance, United Space Alliance, and Wyle.

The breakfast will include a speech by NASA Marshall Space Flight Center Director, Robert Lightfoot, followed by a Q&A session. Approximately 300 people have been invited to attend, including representatives from congressional offices, the Executive Office of the President, the media, the aerospace industry, and other Federal agencies such as DOD and the FAA. The estimated cost of the breakfast, including all food and beverages, is \$25 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow NASA attendees to exchange information regarding NASA policies and programs with interested representatives from other organizations and sectors. Accordingly, NASA employees whose duties do not substantially affect the sponsors, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for free attendance to the breakfast for themselves and their invited spouses or guests.

Moreover, NASA employees whose duties may substantially affect the STA or a majority of its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.


Adam F. Greenstone